

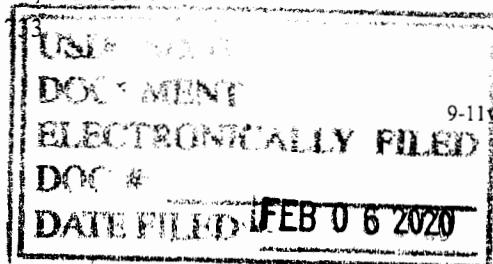
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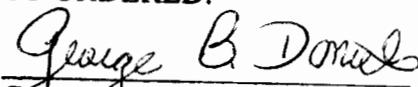


January 29, 2020

VIA ECF –
Courtesy Copy for Chambers By Hand

The Honorable George B. Daniels
 United States District Court
 Southern District of New York
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, New York 10007

SO ORDERED:


 George B. Daniels, U.S.D.J.
Dated: FEB 06 2020RE: *In Re: Terrorist Attacks on September 11, 2001*, No. 03 MDL 1570 (GBD) (SN)

This Document Relates to:

Abel, et al. v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD) (SN); and
Chang Dom Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD)(SN)

Dear Judge Daniels:

We represent certain non-immediate family members of individuals killed in the terrorist attacks on September 11, 2001, and write to ask that this Court grant an extension of time by which those plaintiffs must file objections to the Magistrate Judge's Report and Recommendation of January 23, 2020 (ECF No. 5735) denying certain claims.

This is the first request for an extension of time regarding January 23, 2020 Report and Recommendation. Specifically, we are still in the process of weighing the merits of objections to the denials set forth in the below chart:

Case	Report and Recommendation	Decedent	Plaintiff	Relationship	Solatium Damages
<i>Abel, et al. v. Islamic Republic of Iran</i> , No. 1:18-cv-11837 (GBD) (SN)	January 23, 2020 (ECF No. 5735)	Alejandro Castano	Diana P. Castano	Partner as Spousal Equivalent	DENIED

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Case	Report and Recommendation	Decedent	Plaintiff	Relationship	Solatium Damages
<i>Chang Dom Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD)(SN)</i>	January 23, 2020 (ECF No. 5735)	Peggie Hurt	Margaret Ann Williams	Aunt as Sibling Equivalent	DENIED
<i>Chang Dom Kim, et al. v. Islamic Republic of Iran, No. 1:18-cv-11870 (GBD)(SN)</i>	January 23, 2020 (ECF No. 5735)	Peggie Hurt	Christine Wilson, Katherine Wynn, Edith Otelia Harris, the Estate of Lelia Wynn, and the Estate of Dorothy Lee Coles	Aunts as Parent Equivalent	DENIED

While objections to January 23, 2020 Report and Recommendation would be due February 7, 2020, given the substantial number of pending motions before the Court and the other deadlines,¹ we respectfully request that this Court extend the time by which objections must be filed by forty five (45) days from today, which will allow the non-immediate family members an opportunity to weigh and present any potential legal arguments or factual objections to their denials.

We are mindful that these objections will not be adjudicated until after the February 19, 2020 due date for the current round of U.S. V.S.S.T. submissions; in the event of a reversal of the Magistrate's recommendations, we would submit applications for the next round of applications.

As Iran is the only defendant to this motion and has defaulted (and there is no suggestion that it will appear) this extension of time will impose no undue prejudice.

¹ For example, this litigation has had several recent and approaching deadlines, in addition to the February 19, 2020 deadline imposed by the United States Victims of State Sponsored Terrorism Fund for filing any claims that will participate in the next round of distributions. The Fund also announced on January 23, 2020 certain requirements for estates of both 9-11 Decedents and those of immediate family members which need to be implemented.

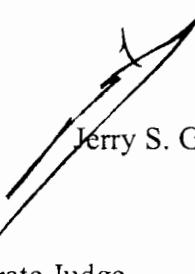
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For the foregoing reasons, we believe that good cause exists to grant this letter-request for an extension of time by which to file any objections to the denials in the Report and Recommendation (ECF No. 5735) until Monday, March 16, 2020.²

We also ask that to the extent the Report and Recommendation grants certain motions for final damages solatium judgments, this Court, if inclined to adopt the recommendations to grant those motions, not delay doing so pending objections to the above-referenced denials.

Respectfully,



Jerry S. Goldman

cc: Honorable Sarah Netburn, U.S. Magistrate Judge
All counsel of record via ECF
Jeffrey E. Glen, Esq.
Vianny M. Pichardo, Esq.

² Forty-five days from today is Saturday, March 14, 2020.